

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

CUTTING EDGE VISION, LLC,  
an Arizona Limited Liability Company,

Plaintiff,

v.

TCL TECHNOLOGY GROUP  
CORPORATION, TCL ELECTRONICS  
HOLDINGS LIMITED, TCL  
COMMUNICATION TECHNOLOGY  
HOLDINGS LIMITED, and TCL  
COMMUNICATION LIMITED,

Defendants.

Civil Action No.: 6:22-CV-00285-ADA-DTG

TRIAL BY JURY DEMANDED

**JOINT STIPULATION REGARDING INFRINGEMENT**

Plaintiff Cutting Edge Vision, LLC (“CEV”) and Defendants TCL Technology Group Corporation, TCL Electronics Holdings Limited, TCL Communication Technology Holdings Limited, and TCL Communication Limited (collectively, “TCL”) hereby stipulate as follows:

In order to simplify discovery and the trial of CEV's infringement assertions in this case, the parties agree that the TCL10L phone updated to Android Version # 11 with Google Photos version # 5.57.0.394309483 (delivered to CEV's counsel as indicated in Invoice #169458 dated July 24, 2023) shall be considered representative of all of the Accused Devices listed in CEV's Second Amended Complaint (Dkt. # 68) for the purpose of determining infringement in this litigation of

the following CEV claims: Claims 1-4 and 16 of U.S. Patent 10,063,761 and Claims 1, 2, 5, and 6 of U.S. Patent 11,153,472.

The parties stipulate and agree to limit discovery, expert reports, evidence, testimony, and the trial on the merits of the infringement issues in this case to the representative TCL10L device. The parties further agree that any finding of infringement or non-infringement with respect to the representative TCL10L device shall apply to all Accused Devices listed in CEV's Second Amended Complaint (Dkt. # 68).

**IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above document has been delivered to all counsel of record through the Court's CM/ECF service on this 25<sup>th</sup> day of July, 2023.

/s/ David N. Deaconson

David N. Deaconson